

Advocates for the West
 Affiliated Tribes of Northwest Indians
 AirWorks, Inc.
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Alternative Energy Resources Organization
 American Rivers
 A World Institute for a Sustainable Humanity
 BlueGreen Alliance
 Bonneville Environmental Foundation
 Centerstone
 Citizens' Utility Board of Oregon
 City of Ashland
 City of Seattle Office of Sustainability & Environment
 Clackamas County Weatherization
 Clean Energy Works Oregon
 Climate Solutions
 Community Action Center
 Community Action Partnership Assoc. of Idaho
 Community Action Partnership of Oregon
 David Suzuki Foundation
 Earth and Spirit Council
 Earth Ministry
 Ecova
 eFormative Options
 Emerald People's Utility District
 EnergySavvy
 Energy Trust of Oregon
 Environment Oregon
 Environment Washington
 HEAT Oregon
 Home Performance Guild of Oregon
 Home Performance Washington
 Housing and Comm. Services Agency of Lane Co.
 Human Resources Council, District XI
 Idaho Clean Energy Association
 Idaho Conservation League
 Idaho Rivers United
 Interfaith Network for Earth Concerns
 League of Women Voters Idaho
 League of Women Voters Oregon
 League of Women Voters Washington
 Montana Audubon
 Montana Environmental Information Center
 Montana Renewable Energy Association
 Montana River Action
 National Center for Appropriate Technology
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest Energy Efficiency Council
 NW Natural
 NW SEED
 OneEnergy Renewables
 One PacificCoast Bank
 Opower
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oregon Energy Coordinators Association
 Oregon Environmental Council
 Oregonians for Renewable Energy Policy
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Portland Energy Conservation Inc.
 Portland General Electric
 Puget Sound Advocates for Retired Action
 Puget Sound Cooperative Credit Union
 Puget Sound Energy
 Renewable Northwest Project
 Save Our wild Salmon
 Sea Breeze Power Corp.
 Seattle Audubon Society
 Seattle City Light
 Seinerger
 Shoreline Community College
 Sierra Club
 Sierra Club, Idaho Chapter
 Sierra Club, Montana Chapter
 Sierra Club, Washington Chapter
 Smart Grid Northwest
 Snake River Alliance
 Solar Installers of Washington
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership
 Southeast Idaho Community Action Partners
 Spokane Neighborhood Action Partners
 Student Advocates for Valuing the Environment
 Sustainable Connections
 The Climate Trust
 The Energy Project
 The Policy Institute
 Trout Unlimited
 Union Of Concerned Scientists
 United Steelworkers of America, District 12
 US Green Building Council, Idaho Chapter
 Washington Environmental Council
 Washington Local Energy Alliance
 Washington State Department of Commerce
 Washington State University Energy Program
 YMCA Earth Service Corps



Bonnie Watson
 Bonneville Power Administration
 VIA email: bfwatson@bpa.gov

RE: Comments on BPA Proposed Allocation – Momentum Savings

Dear Ms. Watson:

The NW Energy Coalition provides the following input in response to BPA's notice for comment on the draft momentum savings allocation methodology. This letter outlines our concerns with the current proposal and requests that BPA not approve the allocation methodology at this time.

I. Process concerns

The Coalition's first concern is with the adequacy of the current process being used to make this momentum savings allocation determination. The Coalition is concerned that regional stakeholders with an interest in this methodology and savings allocation were not sufficiently engaged in the outreach process to date and have had insufficient opportunity to participate in the decision-making process at BPA. While it appears that BPA's customer utilities have been engaged in this dialogue for several months, *"BPA developed the draft momentum savings allocation methods in close collaboration with the public utilities"* (BPA website). The Coalition was not notified nor invited to the meeting that occurred in January 2015 where draft allocation methodologies were discussed. Furthermore, we were not aware of any proposal to allocate momentum savings to individual utilities until June 2015, approximately 2 weeks prior to the initial close of the comment period. Although the comment period was extended by thirty days, the Coalition feels that the notice to and engagement of non-utility stakeholders is insufficient.

At this time, the rationale and purpose for BPA's proposed allocation methodology is unclear. The materials out for review do not explain why BPA is taking this step now, nor do they provide any guidance as to how the momentum savings allocations should or should not be used by utilities. For example, could the momentum savings allocation be counted on in a planning process to assess load reduction in a utility service area?

A related process concern is that the information contained in the spreadsheet circulated for comment contains very little information beyond the actual proposed percentage allocation. Momentum savings are not defined in the document, nor is the scope of the momentum savings included in the allocation calculations. Does this include all momentum savings researched by BPA? Does it include savings from codes and standards? Momentum savings are also not described by type or category either on a per utility basis or regional basis, other than the division of savings into two general categories: residential/non-residential. There is no way to understand what specific measures are being counted, what information is used to determine savings attributions, nor any other information specific to the types of savings being counted. As is, the spreadsheet contains insufficient information to allow a thorough review about whether BPA's allocation methodology is sufficient, accurate or reliable.

II. Accuracy and Reliability Concerns

The rough methods used to calculate each utility's allocation of momentum savings, percent of load (non-residential) and number of customers (residential), are not demonstrated to be accurate nor reliable for determining the rightful share of savings for each individual utility. The energy efficiency industry in the Northwest has developed sophisticated and highly rigorous methods of determining evaluation, monitoring and verification of savings (EM&V). This high level of dependability on savings estimates is critically important to energy efficiency in the region. The Coalition is concerned that BPA's momentum savings allocation methodology does not sufficiently obtain this high level of EM&V. In fact, BPA's own memorandum on this issue states that the proposed allocation methodology contains the following negative attributes: *Cons of Revised Option 1. Might overstate non-residential savings for utilities without gas service in their territories because electric load is used to allocate the savings. 2. Might overstate non-residential savings for utilities with large industrial loads (a sector where Momentum Savings are not currently calculated outside of lighting).*

BPA has identified one particular risk of the allocation methodology's inaccuracy, however, the Coalition feels there may be many more, although we do not have sufficient information to review to determine specific concerns at this time.

III. Risk of Double Counting

Momentum savings calculations raise a number of questions about overlap with other quantifications of savings and present a significant risk of double counting savings. At this point, it is unclear to the Coalition how BPA's calculation of momentum savings interacts or potentially overlaps with NEEA savings and savings calculated by Seinerger. Perhaps more importantly, because most utilities do their own calculation of the savings acquired through their programs, and because utility baselines often differ from those of BPA and the NW Power and Conservation Council, there is a legitimate concern that BPA's calculated momentum savings may already have been counted by an individual utility.

The Coalition reached out to NEEA and Seinerger in an effort to answer these questions, however, the momentum savings allocation methodology materials available for review did not have sufficient information regarding the BPA momentum savings allocation proposal in order to answer these questions.

In summary, the Coalition feels that the allocation methodology is insufficiently developed at this time and should not be approved. Perhaps more importantly, regional stakeholders with an interest in maintaining high levels of evaluation, monitoring and verification related to energy

efficiency savings determinations have not had adequate notice and opportunity to participate in the momentum savings allocation methodology development.

We respectfully request that BPA not approve the allocation methodology at this time. We request that BPA staff examine the issues raised above (double counting, baseline issues, accuracy and reliability of savings allocations) prior to advancing another proposal to allocate momentum savings. We also respectfully request that while a more detailed proposal is being developed, all BPA stakeholders be given sufficient time and information to fully review the allocation methodology.

Thank you for the opportunity to comment on this important issue.

Regards,

/s/ Wendy Gerlitz

Wendy Gerlitz
Policy Director

Cc. Richard G  nec  
Peter Cogswell
Josh Warner